



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
AND ENVIRONMENTAL CONTROL  
DIVISION OF AIR AND WASTE MANAGEMENT  
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WASTE MANAGEMENT SECTION

TELEPHONE: (302) 323-4540

April 5, 1990

Ms. Paula Retzler  
U. S. EPA Region III  
841 Chestnut Building  
Philadelphia, PA 19107

SUBJECT: Halby Chemical Draft Public Health Evaluation

Dear Ms. Retzler:

The State of Delaware has completed its review of the Halby Draft Public Health Evaluation. Below are our comments:

- 1) Typo on page 6-132, Table 6-47. Bobcancer should be noncancer.
- 2) A clear and concise summary of the health assessment is needed.
- 3) The values/units for soil density and soil porosity in Table 6-18 (page 6-85) appear to be incorrect. It looks as though they should be reversed.
- 4) The health assessment should integrate the risks posed by the scenarios with the probability of those scenarios occurring at the Halby site. For example, exposure to groundwater from aquifers below the Halby site by showering poses a quantified risk to human health, however, the likelihood of the development of those aquifers is low due to the poor yield of the wells, and also that the area is currently served by a public water supply who derive their water from sources not related to the Halby site. Thus, the risks stated for the scenarios in the health evaluation may be unduly inflated or overly conservative. In otherwords, the scenarios could be more site specific.

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If you have any questions, please call me.

Sincerely,

*DEW for Thomas S. Andersen*

Thomas S. Andersen  
Hydrologist  
Superfund Remedial

TSA:sfh  
TSA2061

cc: Diane E. Wehner  
Milton M Beck

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